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September 5, 2006 (Via fax 914-390-4152)

(Our File: D492)

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Hon. Colleen McMahon United States District Judge United States Courthouse 300 Quarropas Street, Room 533 White Plains, New York 10601-4150

> Re: Vasquez, et al. v. Torres-Negron, et al.

> > 06-cv-00619 (CM)(MDF)

Dear Judge McMahon:

We represent the defendant Torres-Negron in the referenced matter and attach hereto for your review the Application for Special Admission Pro Hac Vice of Ms. Tamara Sosa Pascual. Ms. Pascual represents Mr. Torres-Negron in the two related actions pending in Puerto Rico.

The parties will be conducting the depositions of the plaintiffs this Thursday and Friday and we would like Ms. Pascual to appear as one of the attorneys of record. We believe Ms. Pascual's knowledge of the facts will assist in the conducting the deposition in an efficient manner.

Respectfully submitted,

William R. Bennett, III

cc:

James Sheinbaum, Esq. Bornstein & Sheinbaum 212.687.8710

Bennett, Giuliano, McDonnell & Perrone, LLP Attorneys for Defendant Fernando Torres Negron 225 West 34th Street, Suite 402 New York, New York 10122 Telephone: (646) 328-0120 Fax: (646) 328-0121 William R. Bennett, III (WB 1383)

# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

FELIPE ROBLES VÁSQUEZ p/k/a RALDY VÁSQUEZ and CAMPESINO MUSIC ENTERTAINMENT GROUP, INC.,

NO. 06 CV 0619 (Mc Mahon)

Plaintiffs,

-against-

FERNANDO TORRES-NEGRÓN.

Defendant.

## APPLICATION FOR SPECIAL ADMISSION - PRO HAC VICE

I, Tamara Sosa Pascual, hereby request to be admitted pro hac vice in the referenced matter, and declare under the penalty of perjury that the following is true and correct:

#### (A) Personal Data:

- (1) Name: TAMARA SOSA PASCUAL, ESQ
- (2) Firm Affiliation: PASCUAL MORAN & ASSOCIATES, C.S.P.
- (3) Mailing Address, City, State and Zip Code:

PMB 137 Ponce De Leon Ave., 1507, San Juan Puerto Rico

- (4) E-mail Address: tamara@pascualmoran.com
- (5) Telephone Number: (787) 722-7575
- (6) Fax Number: (

(787) 722-7579



### (B) Bar Admissions Information:

- (1) State Bar Admissions:
  - (a) Puerto Rico Bar Good Standing Admitted: 1999 Bar ID: 14040
- (2) Federal Bar Admissions:
  - (a) United States District Court for the District of Puerto Rico Good Standing Admitted: 2001
    Bar ID: #217410
  - (b) First Circuit Court of Appeals Good Standing Admitted: 2001 Bar ID: #68973

### (C) Certification of Disciplinary Proceedings:

- X I certify that I am not now, nor have I ever been, subject to any disciplinary action by any state or federal bar association or administrative agency; or,
- I certify that I am now, or have been subject, to disciplinary action from a state or federal bar association or administrative agency. (Attach a letter of explanation to this application.
- (D) Certification of Professional Liability Insurance: I have a professional liability insurance policy which is current, and that policy will remain in effect during the course of these proceedings.
- (E) Representation Statement: I am representing the following party(s) in this case: The defendant Fernando Torres-Negron
- (F) CM/ECF Registration: Concurrent with approval of this pro hac vice application, I acknowledge that I will automatically be registered to access



the court's Case Management/Electronic Case File system. I consent to electronic service pursuant to Fed. R. Civ. P 5(b)(2)(D).

2. Certification of associated Local Counsel: I, William R. Bennett, certify the information contained in this application is true, that I am member in good standing of the Bar of this Court and that I will serve as designated local counsel in this particular

DATED this 1st day of September, 2006

Tamara Sosa Pascual, ESQ

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